

NICOLAS S. GIKKAS (SBN 189452)
THE GIKKAS LAW FIRM
530 Lytton Avenue
2nd Floor
Palo Alto, California 94301
Phone: (650) 617-3419
Facsimile: (650) 618-2600
Email: nsg@gikkaslaw.com

KIEUN SUNG-IKEGAMI (SBN 211762)
JON IKEGAMI (SBN 211766)
INNOVATION COUNSEL LLP
2880 Lakeside Drive
Suite 200
Santa Clara, California 95054
Phone: (408) 331-1670
Facsimile: (408) 638-0326
Email: jsung@innovationcounsel.com
jikegami@innovationcounsel.com

Attorneys for Plaintiff
PETZILLA, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

PETZILLA, INC. a Delaware corporation,
d/b/a Petzila,

Plaintiff,

v.

ANSER INNOVATION LLC, a Minnesota
limited liability company,

Defendant.

Case No. 14-cv-01354 EMC

**PETZILLA'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL ITS
MOTION FOR LEAVE TO FILE
MOTION FOR RECONSIDERATION OF
PLAINTIFF'S MOTION FOR
EXPEDITED DISCOVERY (Dkt. No. 17)
AND CERTAIN EXHIBITS OF THE
DECLARATION OF NICOLAS GIKKAS
IN SUPPORT OF THE MOTION FOR
LEAVE**

Courtroom: 5, 17th Floor
Judge: Hon. Edward M. Chen

Pursuant to N.D. Cal. Civil Local Rule 79-5(d), Plaintiff Petzila, Inc.'s ("Petzila") hereby moves the Court to issue an administrative order that authorizes (1) the sealing of the unredacted version of Petzila's Motion for Leave to File Motion for Reconsideration of Plaintiff's Motion for Expedited Discovery (Dkt. No. 17) ("Motion for Leave") and (2) Exhibits E, F, G, H, I, J, K, L, P, R and S to the Gikkas Declaration ISO Petzila's Motion for Leave ("Gikkas Decl.").

The unredacted version of the Motion for Leave quotes from, and refers to, the aforementioned exhibits in the Gikkas Decl. These exhibits contain documents produced by Defendant Anser Innovation LLC ("Anser") and designated by Anser as confidential at the level of "Highly Confidential – Attorney's Eyes Only," under the terms of the Stipulated Protective Order entered by the Court (Dkt. No. 33). Although the Motion for Leave is supported by Exhibits A-T attached to the Gikkas Decl., only the exhibits identified above contain copies of information designated as confidential by Anser.

The documents designated as confidential were produced by Anser in response to a document request served by Petzila in compliance with the Order Granting in Part and Denying in Part Plaintiff's Motion for Leave to Take Jurisdictional Discovery (Dkt. No. 28). To be clear, Petzila's information is not part of this administrative motion.

The basis for Petzila's administrative motion is set forth in the Declaration of Nicolas Gikkas submitted herewith. A proposed order granting Petzila's administrative motion and authorizing the sealing of the documents is also submitted herewith.

Dated: July 22, 2014

Respectfully submitted,

THE GIKKAS LAW FIRM

By: /s/ Nicolas S. Gikkas

NICOLAS S. GIKKAS
Attorneys for Plaintiff
PETZILLA, INC. d/b/a PETZILA